

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GARY TATINTSIAN, on his own behalf and for the  
benefit of ShopLink Inc.,

Plaintiff/Counterclaim Defendant,

-against-

MIKHAIL VOROTYNTSEV and ELENA  
VOROTYNTSEV,

Defendants, Counterclaim-Plaintiff

and,

SHOPLINK INC.,

Nominal Defendant/Counterclaim  
Plaintiff.

Case No. 16 Civ. 7203 (GHW)(JLC)

**NOTICE OF MOTION FOR  
LEAVE TO WITHDRAW AS  
COUNSEL FOR DEFENDANTS  
MIKHAIL VOROTYNTSEV AND  
ELENA VOROTYNTSEV**

MIKHAIL VOROTYNTSEV,

Third-Party Plaintiff,

-against-

DMITRIY KHMALADZE, ITADAPTER  
CORPORATION, INC., YOUNIS ZUBCHEVICH  
and DIABETICA RESEARCH SOLUTIONS, INC.,

Third-Party Defendants.

SHOPLINK INC.,

Cross-Claim Plaintiff,

-against-

YOUNIS ZUBCHEVICH

Cross-Claim Defendant.

PLEASE TAKE NOTICE THAT, upon the accompanying Declaration of Frank J. Franzino Jr., with the exhibits annexed thereto, and Memorandum of Law in Support of Motion to Withdraw as Counsel for Defendants Mikhail Vorotyntsev and Elena Vorotyntsev, and upon all proceedings in the matter held heretofore, Franzino & Scher LLC will move this Court before the Honorable Gregory Woods, United States District Judge, United States Court House, 500 Pearl Street, New York, New York 10007, at such date and time as the Court may direct, for an order granting Franzino & Scher LLC leave to withdraw as counsel for Mikhail and Elena Vorotyntsev in the above captioned matter pursuant to U.S. District Court for the Southern District of New York Local Rule 1.4 and N.Y. Prof. Conduct Rule 1.16.

Dated: New York, New York  
November 15, 2019

FRANZINO & SCHER LLC

By: /s/ Frank J. Franzino Jr.  
Frank J. Franzino Jr.  
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